PROJECT MANGEMENT PLAN EXAMPLES

Safety Integration - Implementation of Controls Examples

Example 24

5 Health & Safety

This section describes the work controls associated with the 771/774 Closure Project. As prescribed in DOE Order 440.1, Worker Protection Management for DOE Federal and Contractor Employees, the project must comply with the OSHA construction standards for Hazardous Waste Operations and Emergency Response, 29 CFR 1910.120 and 1926. Under these standards, a Building 771/774 Closure Project-Specific HASP has been prepared to address the safety and health hazards of each phase of operations. In addition, the DOE Order for Construction Project Safety and Health Management, 5480.9A, applies to this project. This order requires the preparation of JHAs to identify each task, the hazards associated with each task, and the precautions necessary to mitigate the hazards. Finally, procedures for control of lead, Beryllium and toxic chemicals, contained in the HSP Manual, are also applicable.

To comply with the health and safety standards specified, an Integrated Safety Management (ISM) process has been initiated and will be continuously implemented. The ISM process is illustrated in Figure 5-1 and structured around five core principles:

(1) define the scope of work,

(2) analyze hazards,

(3) develop and implement controls,

(4) per-form work within controls, and

(5) provide feedback and continuous improvement.

The objectives of the ISM and HASP are to:

- Protect the employees, co-located workers, the public and environment from hazards during decontamination and decommissioning.
- Ensure appropriate safety management is administered throughout decontamination and decommissioning.
- Develop and maintain a high level of health and safety awareness that is practiced by all levels of management, supervision, and employees.
- Meet the goal of zero lost time accidents for the entire decontamination and decommissioning process.
- Foster excellent safety communications between all Site work groups that are affected by the decontamination and decommissioning of the 771/774 Closure Project to ensure the intent and goals of RFCA are met.
- Train project personnel so they are capable of completing assigned tasks safely and in compliance with the applicable environmental and safety regulations.

Enhanced Work Planning (EWP) is the natural implementing vehicle to involve workers, and to incorporate the five key elements of the ISM process. The RFETS Enhanced Work Planning program is designed to provide a safer, more efficient work environment by:

- Encouraging worker participation in the initial work planning process to enhance the effectiveness of safety and work efficiency.
- Ensuring hazard analysis and controls are appropriate for the job.
- Improving worker knowledge of safety requirements.
- Fostering teamwork between hourly and salary personnel.
- Improving the technical accuracy and workability of work packages.
- Balancing the degree of work instruction, skill-of--raft, and worksite supervision.
- Reducing the overall time to plan, review, and approve work packages.
- Promoting realistic resource-loaded schedules.

- Enhancing job coordination and improving the efficient execution of the work.
- Continuous improvement through real-time feedback.

EWP considers the entire work process and continually asks the questions necessary to implement a safer, more efficient work control process. However, in the traditional approach to the work control process, technical specialists, management, and workers are given work packages for review during various phases of the work planning process. When changes are made by one or more of the reviewers, the package must be reviewed again by all parties. This sequential review process is inefficient and tends to create conflict between planners, reviewers, and workers. EWP is designed to improve the traditional work control process, primarily through extensive communication and feedback from the appropriate mix of personnel responsible for the work.

5.1 Preliminary Hazard Analysis

During the initial planning for the project, a Preliminary Hazard Analysis Overview (Tables 5-1 through 5-4) was produced to evaluate the potential health and safety hazard baseline for the project. This Preliminary Hazard Analysis includes an evaluation of the types of hazards associated with each phase of the project. The process will facilitate work by identifying preliminary key hazards up front (Tables 5-1 through 5-4) and incorporating risk management into the job planning process. The development and use of a JHA for specific activities developed during the planning and engineering phase of the project will be used to meet the need for continuously updated documentation of Preliminary Hazard Analysis baseline information.

All operations shall be conducted in accordance with the guidance of the Health & Safety Plan (HASP). The HASP will be revised as required by project operations and facility configuration changes at each step to ensure compliance. The Preliminary Hazard Analysis baseline information will be continuously updated and augmented using the JHA process.

Table 5-1 Planning and Engineering Phase

Major Work Task	Hazard	Cause	Preventative Measures
Perform building walkdowns to identify IWCP work steps and engineering order requirements.	Tripping, falling, exposure to chemicals, hazardous substances and/or radioactive materials. Also exposure to noise hazards.	No planning, lack of communicating between work groups, improper use of RWPs, not following room or building instructions.	▪ Develop JHAs and IWCP Work Packages ▪ Conduct effective pre-evolution briefings ▪ Follow all building instructions ▪ Ensure all personnel have been properly trained before entry ▪ Adequate RWPs are developed and followed
Move office equipment and furniture to prepare for D&D activities.	Back strains, pinch points, extremity injuries due to falling objects or moving vehicles.	Improper lifting of equipment, careless handling of equipment, improper planning and walkdowns. No continuing observations or use of the buddy system.	▪ Proper training conducted and documented ▪ Use of the buddy system ▪ Proper use of forklifts and trucks including operating alarm systems and brakes

			▪ Planning meetings and briefings completed ▪ Proper use of JHA and IWCP Work Package ▪ Adequate RWPs are developed and followed
Perform hazard analysis characterization activities. This includes asbestos, chemical, lead and radiological sampling.	Overexposure to substances, accidental inhalation of substances, absorption into skin of substances, eye and skin irritation. Exposure to radiological contamination.	Improper or no use of prescribed PPE, RWP lack of proper planning, not following sampling procedures correctly, improper transport or handling of sampling.	▪ Follow JHA and IWCP Package ▪ Wear prescribed PPE properly ▪ Conduct planning meetings and briefings ▪ Follow RWP ▪ Ensure all required training has been completed

Table 5-2 Decontamination Phase

Major Work Task	Hazard	Cause	Preventative Measures
Perform radiological decontamination operations.	Exposure to radioactive materials internally and externally. Cell damage and damage to internal body organs can occur with acute overexposure to radioactive materials. Improper use of scabbling or other decontamination equipment can injure extremity or other limbs of workers by causing gash or cutting wounds.	Improper clean up techniques including: Improper containment, decontamination or PPE usage. Improper ventilation usage. Improper waste disposal and handling. No or improper training in the proper use of decontamination equipment.	▪ Ensure all workers are trained as Rad Worker II ▪ Ensure all RFETS radiological prerequisites are met prior to job commencing ▪ Develop and implement JHAs and IWCP Work Package for the job ▪ Ensure all medical, equipment, training, and PPE req. are met ▪ Ensure that proper radiological monitoring is performed ▪ Follow the RWP instructions,

			including ALARA review if required ▪ Follow established Site Be procedures

Table 5-3 Dismantlement Phase

Major Work Task	Hazard	Cause	Preventative Measures
De-energize work areas and remove cables and wiring.	Electrical shock to body, cutting of extremities or body parts using wire strippers or other hand tools, falling off ladder or scaffolding, if used. Exposure to radiological contamination.	LO/TO not used properly, all workers not informed of LO/TO status. Improper use of hand tools, ladders or scaffolding. Improper lighting in room can cause improper use of equipment as well. Improper or no use of RWPs.	▪ Utilize lockout and tagout procedures properly ▪ Inspect all hand tools before use ▪ Ensure all workers are trained in ladder, scaffolding and fall protection measures before using this equipment ▪ Develop and utilize IWCP Work Packages and task specific JHAs ▪ Perform work area walkdown and conduct proper planning meetings and briefings ▪ Ensure all worker training is current ▪ Adequate RWP developed and followed
Move equipment out of rooms or area and transport utilizing forklifts, pallet jacks, or pick up trucks.	Back injuries, pinching, and extremity damage by dropping or falling objects. Internal and external body injuries by vehicle impact. Eye injuries by poking or dust particles in eye. Noise hazards. Exposure to radiological contamination.	Improper lifting techniques, job flow not planned properly, pre job walkdowns not performed, vehicle alarm systems not working, buddy system not used, lack of attention to detail, worker fatigue or no use or improper use of PPE. Improper or no use of RWP.	▪ Perform pre job walkdowns ▪ Develop JHAs for job ▪ Use buddy system ▪ Ensure vehicle alarm and braking systems are working properly ▪ Utilize PPE properly ▪ Perform proper lifting techniques ▪ Perform pre job warm up exercises before lifting ▪ Do not attempt to move items that are stacked too high ▪ Cover all sharp edges with taping

			material ▪ Adequate RWP developed and followed
Cut out piping systems in rooms or work areas.	Cutting of body limbs or body parts with mechanical equipment. Piping falling on feet, pinch points of rolling pipe, liquid splashes if piping is not drained, springing of piping into body when cut. Exposure to radiological contamination.	Improper use of mechanical equipment including no training of equipment being used, piping not rigged or restrained properly, piping not drained prior to cutting. Improper or no use of RWP.	▪ Proper training with cutting equipment ▪ Develop and utilize IWCP Work Packages and JHA for job tasks ▪ Rig and restrain piping properly ▪ Utilize pipe caps after cutting to keep debris from falling out and cover sharp edges of pipes after cutting ▪ Ensure piping has been properly taken out of service ▪ Utilize proper PPE as described in the JHA and RWP ▪ Adequate RWP/ALARA review developed and followed ▪ Awareness of possibility of encountering 'hidden' contamination and adequate characterization to identify such contamination
Rig piping and equipment out of rooms.	Bodily injuries due to falling objects or pinching of workers due to space limitations. Exposure to radiological contamination.	No rigging plan, improper rigging techniques, improper worker body positioning. Improper or no use of RWPs.	▪ Develop rigging plan ▪ Comply with all RFETS standards for rigging ▪ Develop JHA and implement ▪ Perform pre job walkdown and conduct pre-evolution ▪ Walkdown rigging path – all phases ▪ Perform pre and post job inspections on all rigging equipment ▪ Ensure all workers are properly trained ▪ Adequate RWP developed and

			followed
Packaging waste into containers for storage and shipment.	Pinching of extremities on container lids, barrels rolling on feet, back strains, foot injuries as vehicle wheels impact or roll onto extremities, cuts/gashes of hands by tooling. Exposure to radiological contamination.	Improper lifting and handling techniques, wrong tooling used to put lids on containers, pallet jack or forklift ramming into workers, job rushed or not planned properly. Improper or no use of RWPs.	▪ Develop JHA and implement ▪ Review lessons learned from previous waste handling operations ▪ Develop proper tool list before starting job ▪ Ensure all waste containers are properly staged before starting job ▪ Ensure all building notifications are made before moving and handling waste ▪ Follow all RFETS requirements for waste handling and movement ▪ Adequate RWP developed and followed
Cut out and remove gloveboxes and tanks in rooms or work areas.	Pinch points, foot and hand injuries, cutting of hands/arms, eye and head injuries, burning of skin or extremities. Exposure to radiological contamination.	Improper use of grinders or no guards on grinders, cramped working conditions, bad lighting, limited vision, breaking of leaded glass, plasma slag burns through clothing, improper use of PPE. Improper or no use of RWPs.	▪ Proper training with cutting equipment ▪ Develop and utilize JHA for job tasks ▪ Rig and restrain gloveboxes properly ▪ Utilize pipe caps on glovebox piping after cutting ▪ Ensure gloveboxes have been properly taken out of service before work starts ▪ Utilize proper PPE as described in the JHA ▪ Perform tooling inspections before each use ▪ Adequate RWP/ALARA review developed and followed
Construct and utilize scaffolding to perform job tasks.	Fall hazards, workers struck by falling objects, hand injuries. Exposure to radiological contamination.	No use of fall protection, improper training, no use of PPE, improper use of tooling, improper rigging and transport of scuffling pieces, no scaffold	▪ Proper training for scaffold erection and use ▪ Fall protection and rigging training ▪ Proper use of PPE

		inspections, scaffold collapse. Improper or no use of RWPs.	▪ Develop JHA ▪ Perform documented scaffolding inspections ▪ Ensure all scaffolding is tagged properly ▪ Ensure all toe boards and side rails are in place ▪ Adequate RWP developed and followed
Perform decontamination operations.	Extremity injuries of hand and feet by gouging, cutting or impact. Inhalation, ingestion or skin exposure to radioactive materials and ammonia vapors. Electrocution. Falls.	Improper or no training on equipment used for decontamination, improper work area ventilation, improper use of PPE, no job planning. NO LO/TO of work area. NO fall protection.	▪ Conduct mock up training on decontamination equipment and stripcoat operations ▪ Develop JHA for job tasks ▪ Ensure work area is properly ventilated before applying stripcoat ▪ Ensure LO/TO operations have been performed ▪ Wear prescribed PPE as determined by IH&S and Rad Protection ▪ Utilize fall protection, when required ▪ Follow all JHA and RWP requirements ▪ Use appropriate engineering controls to reduce possible airborne contamination
Perform final cleanup of building/structure.	Tripping, falls, head wounds, pinch points, punctures, contusions, skin contamination, inhalation, absorption of radioactive materials.	Housekeeping, falling objects, non-use of PPE, improper use of PPE, sharp edges or sharp objects not protected, no fall protection, improper ladder use.	▪ Perform weekly housekeeping inspections ▪ Utilize fall protection, when applicable ▪ Develop JHA for job task ▪ Utilize PPE ▪ Follow all ALARA reviews, JHAs, and RWP
Perform final survey of building.	Falls, head wounds, electric shock,	No fall protection, improper use of instrumentation,	▪ Develop JHA ▪ Perform pre job

	abrasions, cuts, pinches. Radiological contamination.	working in tight spaces, tripping hazards, bad housekeeping, improper termination of wiring. Prior operations exposing contaminated surfaces during decommissioning.	walkdowns ▪ Utilize fall protection, when required ▪ Complete ladder training, as required ▪ Utilize two person rule when working in elevated locations ▪ Procure confined space permits and training, when required ▪ Follow all JHA, RWP and Final Survey Plan requirements ▪ Survey in accordance with approved site procedures ▪ PPE per RWP ▪ Train personnel

Table 5-4 Demolition Phase

Major Work Task	Hazard	Cause	Preventative Measures
Perform demolition activities of building/structure.	Body contusions, head injuries, suffocation, fatalities, breathing hazards.	Wetting of concrete surfaces not utilized, barriers not used properly, through inspections of work area not performed prior to demolition activities, lack of attention to detail.	▪ Develop job JHA and IWCP Work Packages ▪ Perform pre job walkdowns ▪ Utilize PPE as prescribed by IH&S ▪ Maintain wetting of debris with fire hoses as demolition occurs

5.2 Job Hazard Analysis

The detailed technical approach to decommission an area/room will be developed and approved in accordance with the IWCP process. The IWCP Work Package contains detailed instructions for performing work on site and contains specific controls and requirements to ensure protection of the workers, public, and environment. Given the tasks identified in the specific IWCP Work Package and consistent with the ISM process and the HASP, the work supervision, craft and industrial hygiene personnel will conduct an EWP session to evaluate all work tasks for the potential to injure or damage personnel, property or the environment. This JHA will describe the hazards as well as the actions necessary to eliminate or mitigate those hazards (i.e., training requirements, protective control measures, monitoring requirements and special equipment needed for specific job steps).

5.3 Monitoring

Occupational monitoring requirements for individual work tasks will be identified during the EWP session and documented in the JHA. Typical monitoring activities are summarized on Table 5-5.

5.3.1 Chemical Hazard Monitoring

Per the HASP, the need for chemical hazard monitoring will be determined by the Project Safety Officer or designee. All air sampling and monitoring will be performed in accordance with approved National Institute of Occupational Safety and Health or OSHA sampling methods using either direct reading instrumentation or personal air sampling as directed by the IH&S lead or designee. All instrumentation used will be calibrated in accordance with factory recommendations.

Table 5-5 Typical Monitoring Activities

Hazard	Exposure Control Limit	Monitoring Method	Frequency of Monitoring
Exposure to hazardous substances such as lead, asbestos or any other material(s) identified that are respirable.	Permissible Exposure Limits (PEL's) are based on 8 hour Time Weighted Average (TWA) exposure and Short Term Exposure Limits (STEL's) set forth by the Occupational Safety and Health Administration (OSHA) or the American Conference of Governmental Industrial Hygienists (ACGIH), whichever is more conservative.	Many hazardous substances are monitored using a personal air sampling pump such as a Gilair or SKC to obtain a continuous sample of the most at-risk worker's breathing zone. The sample media, sampling technique and analysis method are unique to the substance being monitored and are specified by OSHA or the National Institute for Occupational Safety and Health (NIOSH).	Continuously during work; short term samples as required to document STEL's. Continuous area monitoring and clearance sampling as required.
Silica dust	0.05 mg/m³.	Aerosol monitor such as an MIE PDM-3.	As required by the JHA.
Heat Stress	The need to regulate periods of work and rest are determined using worker dress-out, work activity and thermal environment.	Monitor the thermal environment with a wet bulb temperature monitoring device such as a WBGT. Worker condition can be checked using body temperature, pulse and visual assessment.	Varies by conditions and work tasks.
Noise	85 dB continuous for an 8hr exposure period; expressed as a Threshold Limiting Value (TLV).	Monitor work environment using a sound level monitor. Use noise dosimeters on highest risk workers.	Daily and as required during tasks by the JHA or conditions.

Radiological Hazard Monitoring

Per the HASP, air monitoring within the work areas will be performed using portable Continuous Air Monitors (CAMs), high volume and low volume air sampling. The use of portable CAMs allows the project flexibility in monitoring locations, resulting in more effective monitoring. Training on the use and response of these monitors will be provided to all project personnel. Personnel monitoring for radiological hazards will be identified in RWP's and the ALARA job reviews. All radiological monitoring will be performed in accordance with the procedures contained in the RFETS HSP Manual, RFETS Radiological Control Manual, and the Radiological Safety Procedures (RSPs).

The requirements for monitoring radiological hazards from the RFETS Radcon Manual are individualized to a particular work task and are documented in the RWP. Typical monitoring for radiological hazards will include:

- Airborne - Monitored using high or low volume sampling pumps. Sample media is typically glass fiber filter and must be counted for alpha and/or beta-gamma activity to determine the exposure. Exposure is measured in Derived Air Concentrations (DAC's) and is dependent upon the particular radionuclide(s) present (e.g., Pu-239 DAC is 2E-12 microcuries per milliliter [µCi/ml]). The frequency of monitoring is dependent upon the work task and contamination levels and is specified in the RWP.
- Contamination - Monitored by smear sample and/or direct measurement with a frisking instrument such as a Bicron Frisktech. Limits for contamination are listed in the PFETS Radiological Control Manual and are dependent upon the particular radionuclide present and are expressed in units of dpm/100 cm² . Frequency of monitoring will include routine surveys (shiftly, daily, etc.), as required by the RWP and at the discretion of Radiological Controls personnel.
- Radiation - Radiation surveys are performed using instrumentation that is capable of detecting the type and energy of emitted energy present and is expressed in units of mrem/hr. These exposure rates are used to determine personnel exposure estimates, provide data to ensure that all exposure is As Low As Reasonably Achievable (ALARA), and to properly control areas of potential exposure to personnel. Personnel exposure is monitored using Thermal Luminescent Dosimeters (TLDs) and the results become permanent exposure records. Frequency of monitoring will include routine surveys, as required by the RWP and at the discretion of the Radiological Controls personnel.

Air Monitoring

The K-H Air Quality Management (AQM) organization provides monitoring support for RFETS. The existing Radioactive Ambient Air Monitoring Program (RAAMP) continuously monitors for potential airborne dispersion of radioactive materials from the site to the surrounding environment. Thirty-one samplers compose the RAAMP network. Twelve of these samplers are deployed at the site perimeter and are commonly used to measure potential off-site impact. The others are used should there be a need to assess local (i.e., on-site) impacts. During demolition activities, on-Site samplers located near the demolition area will be used to characterize the contaminants that may have become airborne due to the demolition activities. Samples will be collected weekly and will be screened to identify any periods that may have yielded higher than expected emissions. The screening analysis will allow quicker feedback to project staff than is possible when the samples are subjected only to the more time-intensive routine isotopic analysis.

Example 25

9.0 ENVIRONMENT, SAFETY AND HEALTH

The following summary describes B Plant's approach to protect the public, workers and the environment throughout the transition project. Following the principles of Defense Nuclear Facility Safety Board (DNFSB) Recommendation 95-2, safety considerations are integrated into management, planning and work processes.

9.1 ENVIRONMENTAL REGULATORY STRATEGY

The strategy for environmental compliance throughout B Plant transition is to apply the process described in the *Tri-Party Agreement,* Sixth Amendment, Section 8.0, "Facility Decommissioning Process," and to apply the lessons learned from PUREX transition and other deactivation projects for environmental/regulatory process improvement. The overall goal of this strategy is to comply with all applicable environmental laws and regulations during B Plant transition.

The following discussion provides the status of major compliance areas, and discusses the strategy associated with each:

- RCRA Status/Strategy - B Plant currently manages eight dangerous waste units under the treatment, storage, and disposal requirements of Washington State Dangerous Waste regulations, WAC 173-303. These units are described in the "Hanford Facility Dangerous Waste Part A Permit Application, Form 3, Revision 5, For the B Plant Complex (WA7890008967) (TSD: TS-2-3) (Part A)." The TSD units are operated in compliance with applicable interim status requirements of 40 CFR 265, and "Tri-Party Agreement" milestone M-82-00.

  Endpoint criteria for the TSD units will be determined using PUREX as a model and shall provide the requirements to minimize hazards in the TSD units and the basis for detailed actions described in the Preclosure Work Plan. These actions will facilitate the long term S&M and disposition phases of B Plant decommissioning.

- Clean Air Act Status/Strategy - all new activities, construction, and/or modifications at B Plant that have the potential for increasing radioactive air emissions are required to be evaluated through the Notice of Construction Process. Any activity requiring a notice of construction will also require an update of the Air Operating Permit that takes effect in November of 1997.

  The B Plant Stack (291-B-1) is considered a major stack under NESHAPs regulations and is the only major stack at B Plant. Under these regulations, continuous monitoring is required. However, in conjunction with transition activities, a NESHAPs assessment will be performed (after activating the new stack provided by Project W-059) to evaluate reducing this stack to a minor stack after transition is complete. Status as a minor stack would only require periodic confirmatory measurements. Stacks 296-B-5 and 296-B-13 are associated with buildings 221-BB and 221-BF. These stacks are minor stacks under NESHAPs regulations and plans include isolating and removing them from the Department of Health registered stacks list.

- Clean Water Act/Safe Drinking Water Act Status/Strategy - B Plant currently manages two liquid effluent streams: the B Plant Cooling Water (CBC) stream and the B Plant Chemical Effluent (BCE) stream. Both B Plant and WESF contribute to these streams.

  Contributors to the CBC include high-risk cooling water from B Plant and low-risk cooling water from the WESF pool cells. During transition, elimination of the high-risk cooling water from B Plant and the completion of Project W-252, which provides closed loop cooling for WESF pool cells, will eliminate the CBC effluent discharge to B-Pond (TPA milestone M-17-OOB).

  Contributors to the BCE include chemical sewer effluent from B Plant, floor drains in B Plant, WFSF, and the maintenance shops, and cooling water effluent from the various air compressors in B Plant and WESF. Although transition activities will eliminate the B Plant sources and reduce the overall BCE flow, the stream will not be eliminated entirely. Effluent from the WESF closed loop cooling system will be routed to the 200 Area Treated Effluent Disposal Facility (TEDF), which is operated under a 216 State of Washington Wastewater Discharge Permit. Additionally, minor contributors from WESF, currently combined with the B Plant sources to the BCE, will continue to be discharged to the TEDF.

- National Environmental Policy Act (NEPA)/State Environmental Policy AC (SEPA) Status/Strategy - waste management operations at B Plant are provided NEPA coverage under the "Final Environmental Impact Statement--Waste Management Operations, Hanford Reservation (ERDA-1538)," written in December 1975. This document addresses the environmental impacts of such operations as liquid waste transfers, solid waste generation and disposal, management of gaseous effluents, management of liquid effluents, as well as other functions that are no longer performed at B Plant (e.g., NCAW pretreatment, Sr and Cs recovery, etc.).

Transition activities currently planned and/or underway (early assumptions being initiated in parallel with end point development) have been addressed in Categorical Exclusion/Information Bulletins.

Deactivation efforts outside the scope of activities covered under the above mentioned NEPA documentation, could potentially require the preparation of additional NEPA documentation. As the transition planning is further developed, the work scope for transition activities will be evaluated to determine the proper level of required NEPA documentation. A similar approach was used successfully for the PUREX deactivation project.

State and local government agencies are required to comply with SEPA before any permit is issued. Compliance is initiated by submission of a completed SEPA environmental checklist. A SEPA environmental checklist will accompany the B Plant Preclosure Work Plan.

- National Historic Preservation Act (NHPA) Status/Strategy - NHPA provisions found in 36 CFR 63, "Determination of Eligibility for Inclusion in National Register," require Federal agencies to survey all lands and structures under their control and to identify and evaluate all properties for their eligibility for listing in the National Register of Historic Places. However, a 1996 agreement between the Washington State Historic Preservation Office (SHPO), the Department of Energy, Richland Operations Office (RL), and the National Advisory Council on Historic Preservation (Council) has replaced the normal provisions of the NHPA. The 1996 agreement is designated the "Programmatic Agreement [PA] ... on the Built Environment, Hanford Site." This PA requires that a Historic Property Inventory Form (HPIF) be completed and filed for certain Hanford properties designated.

  The only B Plant/WFSF structures directly impacted by the provisions of the PA are the 225-B, 212-B and 276-B facilities. The 225-B facility will require an Expanded HPIF, and the 212-B and 276-B facilities will require standard HPIFS. No major modifications or alterations to these facility structures (except normal deactivation actions as specified in the Hanford Site-wide CX for Deactivation) may take place until the historic documentation is in place.

  Until such time the historic documentation is in place for the buildings listed above, evaluations will be performed to evaluate adverse effects to the historic significance of the facilities for activities associated to the buildings.

- Tri-Party Agreement Milestones - on January 3, 1996 (within three months of receiving a formal notice of facility shutdown from DOE-HQ), RL initiated negotiations with stakeholders in the development of B Plant Transition Project milestones. Using the PUREX model and lessons learned from previous deactivation projects, these negotiations produced a set of TPA milestones for the transition phase of B Plant decommissioning, consistent with the PUREX examples. Major milestones, Interim milestones, and target actions form the basis for B Plant transition work and coincide with early assumptions and end points developed for B Plant transition. These milestones (M-82 series) and the associated agreements reached are reflected in the project baseline schedule shown in Section 6.0 and in the plans/strategies employed for the B Plant Transition Project, as reflected throughout this PMP.